

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF TENNESSEE AT KNOXVILLE

GRANT HAMRICK,

PLAINTIFF,

v.

No. 3:20-cv-00417-TRM-dcp
JURY DEMAND

SPLASH TRANSPORT, INC.,
AHMED ELMEHALAWY,
NANDLEEN, LLC d/b/a NANDLEEN
LOGISTICS, and
REGINALD DEVON JAMES

DEFENDANTS.

DECLARATION OF MATTHEW E. WRIGHT

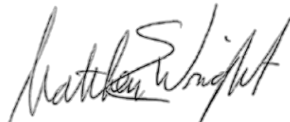
I, MATTHEW E. WRIGHT, declare:

1. I am the attorney or record for the Plaintiff, **GRANT HAMRICK (“Mr. Hamrick” or “Plaintiff”)**, in this matter and have personal knowledge of the facts set forth (unless the context suggests otherwise) in this Declaration.
2. On September 17, 2020, I caused to be served on Defendant Nandleen, LLC, d/b/a Nandleen Logistics (“Nandleen, LLC”) a Request for Preservation letter via FedEx Delivery to the listed office address for Nandleen, LCC.
3. Defendant Nandleen, LLC received the Request for Preservation letter via FedEx Overnight Delivery on September 18 2020, as the FedEx package was signed for by “K. Kim.”

4. The owner of Nandleen, Ailende Omozokpea testified that “K. Kim” used to work at the building and always gave Mr. Omozokpea his mail and he had no reason to believe that Ms. Kim would not have given the Request for Preservation letter to him.
5. On September 21, 2020, I caused to be served on Defendant Reginald Devon James a Request for Preservation letter via FedEx Delivery. Due to a delay caused by the incorrect name and address for Defendant James on the Traffic Crash Report, the package was not delivered until September 24, 2020.
6. On October 1, 2021 and October 19, 2020, following the identification and marking as late filed exhibits, I emailed counsel for Defendants Nandleen, LLC and James requestion the information that was to be marked as late-filed exhibits.
7. Nandleen, LLC nor its counsel has ever produced these materials and according to Nandleen, LLC’s corporate representative, he failed to preserve the texts and destroyed the phone he had used to send and receive those texts.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed this 12th day of November 2021.



Matthew E. Wright